



NEW YORK  
REGIONAL OFFICE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
100 PEARL STREET, SUITE 20-100  
NEW YORK, NY 10004-2616

February 20, 2025

**VIA ECF**

The Honorable Pamela K. Chen  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East, Chambers N 631  
Brooklyn, NY 11201

Re: **SEC v. Richard Xia, et al., 21-cv-05350-PKC-JAM**

Dear Judge Chen:

Plaintiff Securities and Exchange Commission (“SEC”) respectfully writes to request an extension of time to submit a draft of the proposed language described in the Court’s docket order of February 12, 2025, which instructed the SEC to submit a draft “by 2/19/25.” We apologize for missing yesterday’s deadline; the Court had stated during the February 12 conference that the language was to be submitted by Friday, February 21 (ECF No. 550 at 38:8-9 (Transcript of 2/12/25 Conference)), and we belatedly noticed that the docket entry set February 19 as the date for the SEC’s submission.

The SEC continues to work on proposed language, and we spoke with Mr. Leo and Richard Xia’s counsel, Mr. Hantman, on Tuesday, February 18, about this and other issues raised during the conference. We request an extension of time to Wednesday, February 26, to finalize and submit the proposed language.<sup>1</sup>

Respectfully submitted,

/s/ Christopher M. Colorado

David Stoelting

Christopher M. Colorado

Kim Han

Securities and Exchange Commission

*Attorneys for Plaintiff*

cc: All defense counsel (by ECF)

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<sup>1</sup> On February 19, we asked Richard Xia’s counsel to consent to this request for an extension, but we have not received a response.